

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

In re: Sergio Plaza Busante, Jr.  
Lydia Traquena Busante

Case No. 19-70044-FJS

Debtors.

Chapter 7

**MOTION TO SUBSTITUTE COUNSEL OF RECORD**

NOW COMES Harry Jernigan CPA Attorney, P.C., and moves this Court for the entry of an Order substituting Carolyn L. Camardo, Esquire as Counsel of Record in this case, and in support thereof, states as follows:

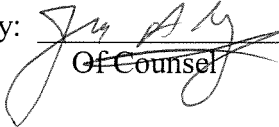
1. Jared A. Mangum, Esquire has resigned from Harry Jernigan CPA Attorney, P.C. to accept a full-time position with another law firm.
2. The Debtors have requested to have the firm of Harry Jernigan CPA Attorney, P.C. represent her in their bankruptcy.
3. Carolyn L. Camardo, an attorney at Harry Jernigan CPA Attorney, P.C., the firm with which Jared A. Mangum practiced during the development and filing of the case, is well-equipped, with the assistance of firm staff, to continue effective representation of the Debtors.

FURTHERMORE, Counsel prays that the Court will allow Jared A. Mangum, Esq. to withdraw as counsel in this case and for entry of an Order substituting Carolyn L. Camardo, Esq. as Counsel of Record in this case.

Jared A. Mangum, Esquire, VSB #88501  
**HARRY JERNIGAN CPA ATTORNEY, P.C.**  
5101 Cleveland Street, Suite 200  
Virginia Beach, VA 23462  
(757) 490-2200 Telephone  
(757) 490-0280 Facsimile  
*Counsel for Sergio Plaza Busante, Jr. and Lydia Traquena Busante*

SERGIO PLAZA BUSANTE, JR.  
LYDIA TRAQUENA BUSANTE

Dated: 2/6/19

By:   
Of Counsel

Jared A. Mangum, Esquire, VSB #88501  
**HARRY JERNIGAN CPA ATTORNEY, P.C.**  
5101 Cleveland Street, Suite 200  
Virginia Beach, VA 23462  
(757) 490-2200 Telephone  
(757) 490-0280 Facsimile  
*Counsel for Sergio Plaza Busante, Jr. and Lydia Traquena Busante*

**CERTIFICATE OF MAILING**

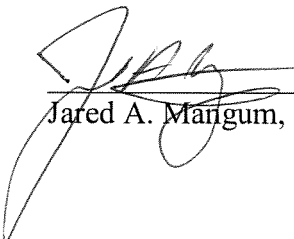
I hereby certify that a copy of the foregoing Motion to Substitute Counsel of Record was served via Electronic Case Filing mailed to the following this 6 day of February, 2019:

Office of the U. S. Trustee  
Federal Bldg., Rm. 625  
200 Granby Mall  
Norfolk, VA 23510

Tom C. Smith, J., Chapter 7 Trustee  
P.O. Box 1506  
Virginia Beach, Virginia 23451

and served via U.S. Mail to the following:

Sergio Plaza Busante, Jr.  
Lydia Traquena Busante  
525 Declaration Road  
Virginia Beach, Virginia 23462

  
Jared A. Mangum, Esquire

## PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

In re: Sergio Plaza Busante, Jr.  
Lydia Traquena Busante

Case No. 19-70044-FJS

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### ORDER SUBSTITUTING COUNSEL

ON THIS DAY came Sergio Plaza Busante, Jr. and Lydia Traquena Busante, Debtors, by Counsel, on the motion for the substitution of Carolyn L. Camardo, Esquire, as legal counsel for the Debtors in the place and stead of Jared A. Mangum, Esquire.

It appearing to the Court that good cause exists for the entry of this Order, it is hereby

**ADJUDGED, ORDERED and DECREED** that Jared A. Mangum, Esquire (VSB #88501), is hereby authorized by this Court to withdraw as legal counsel for the Debtors in this case, and that Carolyn L. Camardo, Esquire (VSB #23814) be substituted as Counsel of record.

Entered on Docket: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Frank J. Santoro  
United States Bankruptcy Judge

Carolyn L. Camardo, Esquire, VSB, #23814  
**HARRY JERNIGAN CPA ATTORNEY, P.C.**  
5101 Cleveland Street, Suite 200  
Virginia Beach, VA 23462  
(757) 490-2200 Telephone  
(757) 490-0280 Facsimile  
Email: [ccamardo@hjalw.com](mailto:ccamardo@hjalw.com)  
*Counsel for Sergio Plaza Busante, Jr. and Lydia Traquena Busante*

WE ASK FOR THIS:

Jared A. Mangum, Esquire, VSB #88501

Sergio Plaza Busante, Jr., Debtor 1

Lydia Traquena Busante. Debtor 2

Carolyn L. Camardo, Esquire, VSB #23814

SEEN AND NO OBJECTION:

Tom C. Smith, Jr., Chapter 7 Trustee

LOCAL RULE 9022-1(C) CERTIFICATION

THE FOREGOING ORDER WAS ENDORSED BY AND SERVED UPON ALL NECESSARY PARTIES PURSUANT TO LOCAL RULE. 9022-1(C).

Carolyn L. Camardo, Esquire

**PARTIES TO RECEIVE COPIES**

Carolyn L. Camardo, Esquire  
VIA ECF electronic notice

Tom C. Smith, Jr., Chapter 7 Trustee  
VIA ECF electronic notice

Office of the U. S. Trustee  
Federal Bldg., Room 625  
200 Granby Street  
Norfolk, VA 23510

Sergio Plaza Busante, Jr.  
Lydia Traquena Busante  
525 Declaration Road  
Virginia Beach, Virginia 23462